



September 23, 2008

Indiana Economic Development Corporation

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Indiana Professional Licensing Agency

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Dear Ms. McNutt:

Pursuant to IC 4-22-2-28, The Indiana Economic Development Corporation ("IEDC") has reviewed the economic impact analysis for small businesses associated with rule changes proposed by the Indiana Professional Licensing Agency ("IPLA") on behalf of Indiana State Board of Health Facility Administrators ("Board") and contained in LSA Document 08-216. The proposed rule amends 840 IAC 1 and 840 IAC 2 to implement changes to comply with Senate Enrolled Act 333-2007. The rule establishes criteria for licensure of residential care administrators, establishes separate education, experience, and training requirements for licensure as a residential care facility administrator and a comprehensive care facility administrator. The proposed rule only impacts administrator licensees and applicants. In the proposed rule, licensees and applicants are required to have attained a level of education, complete a instructional course prescribed by the Board that occurs in a licensed comprehensive care facility, and licensees are required to complete 40 hours of continuing education credit through a Board approved program.

Small businesses impacted by this rule are comprehensive care facilities, residential care facilities, and hospital based long term care units. Licensed long term care facilities must have licensed administrator of record at each location. The Board estimates, there are approximately 1300 actively licensed health facility administrators. There are approximately 600 licensed facilities in the state. Of these 600 facilities an unknown number fall under the definition of small business as is defined by IC 4-22-2.1-4.

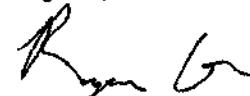
Total costs for small business is limited to the cost of applications and renewals for individual applicants and licensees who may be employed by a small business. The \$100 application and biennial renewal fee assessed to residential health administrators will be the same as the current fees assessed to comprehensive health facility administrators. There are no additional reporting requirements or record keeping expenditures. The Board anticipates only a small increase, if any, in the number of applicants applying for licensure as either a residential care facility or a comprehensive care facility administrator. Therefore, there will only be a minimal additional impact to small business in regard to annual reporting and record keeping.

The IEDC does not object to the economic impact to small businesses associated with the proposed rule. The proposed rule complies with Senate Enrolled Act 333-2007, which required the Board to implement this rule. The intent of this rule is to provide a larger pool of candidates for hire as administrators of Residential Care Facilities. This rule assists facilities in attracting qualified and competent candidates to ensure that patients are receiving the best care possible. The number of

applicants is not expected to increase substantially. Additionally, the IPLA is required to set fees at a level necessary to cover the costs of its boards and commissions. The proposed rule was determined to be the fairest and most cost effective means of carrying out the IPLA's duties.

If you have any questions about the comments contained herein please contact me at 233-8962 or [rasberry@iedc.in.gov](mailto:rasberry@iedc.in.gov).

Regards,



Ryan Asberry

Assistant Vice President